

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION**

**KIMORA WASHINGTON, as  
Administrator of the Estate of  
KEVIN FORD,**

**Plaintiff,**

**v.**

**GWR MANAGEMENT, LLC and GWR  
FLAT ROCK PARTNERS, LLC**

**Defendants.**

**CIVIL ACTION FILE NO.  
4:24-cv-00081-CDL**

**JURY TRIAL DEMANDED**

**DECLARATION OF WILLIAM M. COMPTON**

I, William M. Compton, make this declaration in support of Plaintiff's Response in Opposition to the Motion to Quash of Non-Parties Century Fire Protection, LLC, SEA, Ltd., and Cunningham Investigative Associates [Doc. 27].

1. I am over the age of 18 and make this declaration based on personal knowledge.
2. I am lead counsel for Plaintiff in the above-captioned matter.
3. Counsel for Century Fire Protection, LLC, SEA, Ltd., and Cunningham Investigative Associates (the "Non-Parties") did not confer with me prior to filing the Non-Parties' Motion to Quash
4. After the Non-Parties filed their Motion to Quash, I sent an email to their attorney attempting to resolve the issues raised in the Motion to Quash. A true and correct copy of that email is attached hereto as Exhibit 1.
5. Counsel for the Non-Parties did not respond to my email.

I declare under penalty of perjury that the above information is true and correct.

**[SIGNATURE ON THE FOLLOWING PAGE]**

Dated: February 27, 2025

Respectfully Submitted,

*Max Compton*

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William M. Compton

# **EXHIBIT 1**

**From:** [Max Compton x4817](#)  
**To:** [havlikg@deflaw.com](mailto:havlikg@deflaw.com)  
**Subject:** Century Fire Protection Subpoenas  
**Date:** Monday, February 10, 2025 2:25:00 PM  
**Attachments:** [mmlogo\\_4d481f35-1840-4531-86f0-09098b1154be.png](#)

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Hi Gwen,

I just received your Motion to Quash. I suspect we could reach a resolution on the scope of these subpoenas without further court intervention. Do you have time to discuss?

Thanks

Max

**Max Compton**

Attorney

My Bio

T: [\(912\) 443-1017](tel:(912)443-1017)

F: (912) 443-1184

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